



## Board Policy – Governance

### PRIVACY POLICY

Adopted: March 14, 2016  
Approved: March 14, 2016  
Amended: November 8, 2021

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#### Policy Statement

Hamilton Conservation Foundation (the Foundation) is committed to protecting the privacy of the personal information of its volunteers, members, donors and other stakeholders. We value the trust of those we interact with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us. The Foundation will adhere to the *Personal Information Protection and Electronics Documents Act (PIPEDA)*.

During the course of various projects and activities, the Foundation frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of this information is subject to consent. The Foundation's privacy practices are designed to achieve this.

#### Defining Personal Information

Personal information is any information that can be used to distinguish, identify, or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information. Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

Information in the public domain is not subject to privacy legislation and as such is not included in this policy.

We consider donor and volunteer information always to be personal information, and do not disclose information about donors or volunteers without consent.

#### Practices

##### 1. Consent

An individual's consent is required regarding the collection and proposed use of personal information at the time the information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's express consent is required before personal information is released to outside parties.

## 2. Withdrawal of Consent

The Foundation offers individuals the opportunity not to receive any or all communications from us. Such requests will be respected and acted on promptly.

## 3. Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. The Foundation shall not make unwarranted or intrusive inquiries into a donor's, volunteer's or potential donor's gift history or personal life. The Foundation identifies the source of all data that it collects.

## 4. Limited Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

## 5. Accuracy

Personal information shall be as complete, accurate, and up-to-date as possible. Donors are encouraged to review, correct and update personal information.

## 6. Security Safeguards

Personal information gathered by the Foundation shall be kept in confidence. Foundation staff shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities.

Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

## 7. Confidentiality

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous subject to being obliged to release such information to third parties in order to comply with statutory or regulatory requirements.

## 8. Openness

Upon request, individuals shall be given access to the information in their donor record.

For more information, please contact:

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